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m:
e:



Mr Simon Davis
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Date: 23rd August 2018

Your Ref: AL/57/18/OUT

Dear Simon,

AL/57/18/OUT - Land east of Lidsey Road

I wanted to write to you regarding the above mentioned planning application given since its submission, there have been three changes in circumstances which require comment. These are as follows:

1. Publication of new National Planning Policy Framework.
2. Adoption of new Arun Local Plan
3. Determination of nearby application for 55 dwellings (AL/115/17/OUT)

In addition, this note is intended to respond to the recently submitted representations.

To ensure that the application is considered fully and against current policy, I wanted to write to provide a further update. In the interests of completeness and clarity, I have broken this down into the three different elements.

National Planning Policy Framework - 2018

The former National Planning Policy Framework was published in March 2012. Over the past 12 months, consideration has been given to the publication of a revised National Planning Policy Framework which was eventually done the day before the summer recess of Government and was published in July 2018.

Paragraph 8 states that achieving sustainable development means the planning system has three over-arching objectives, which are inter-dependent and need to be pursued in mutually supporting ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and co-ordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with

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accessible services and open spaces that reflect current and future needs and supports communities' health, social and cultural well-being, and;

- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve by diversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including to a low carbon economy.

Paragraph 12 stated that the presumption in favour of sustainable development does not change the statutory status of a development plan as a starting point for decision making. Where a planning application conflicts an up to date development plan, permission should not normally be granted. Local Planning Authorities may take decisions to depart from up to date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

Paragraph 59 states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land for permission is developed without unnecessary delay.

Paragraph 67 stated that strategic policy making authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land available assessment. From this, Planning Policy should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning Policy should identify a supply of a) specific deliverable sites for years 1-5 of the plan period, and; b) specific developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15 of the plan.

Paragraph 68 states that small and medium sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. To promote the development of a mix of sites, Local Planning Authorities should:

- a) identify through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
- b) use to all such area why design assessments and local development orders to help bring small and medium sites forward;
- c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes, and;
- d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

Paragraph 77 states that in rural area, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local Planning Authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.

Paragraph 78 states that to promote sustainable development in rural areas, housing should be located where it would enhance or maintain the vitality of rural communities. Planning policy should identify opportunity to villages to grow and thrive, especially where this will support local services. Where there are groups of small settlements, development in one village may support services in a village nearby.

Paragraph 81 states that Planning Policy should:

- a) set out a clear economic vision and strategy which positively and practically encourages sustainable economic growth, having regard to local industrial strategies and other local policies for economic development and regeneration;
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the planned period;
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment, and;
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live work accommodation), and to enable a rapid response to changes in economic circumstances.

Paragraph 84 states that planning policies and decisions should recognise that sites to meet local and business community needs in rural areas may have to be found adjacent to or beyond existing settlements and in locations that are not well served by public transport. In these circumstances, it will be important to ensure that development is sensitive to its surroundings, does not have unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example, by improving the scope for access on foot, by cycling or by transport). The use of previously developed land and sites that are physically well related to existing settlements, should be encouraged where suitable opportunities exist.

Paragraph 91 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places, which:

- a) promote social interaction, including opportunities for meetings between people you might not otherwise come into contact with each other – for example, through mixed use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods and active street frontages;
- b) are safe and accessible, so that crime and disorder and the fear of crime, do not undermine the quality of life or community cohesion;
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example, with the provision of safe, accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

Paragraph 96 states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policy should be based on robust and up to date assessment of the need for open space, sport and recreation facilities and opportunities for new provision.

Paragraph 103 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas and this should be taken into account in both plan making and decision making.

Paragraph 118 states that planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improved access to the countryside;
- b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
- c) gives substantial weight to the value of using suitable brown field land within settlement for homes and other identified needs and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
- d) promote and support the development of under-utilised land and buildings, especially as this would help to meet identified needs for housing where land supply is constrained and sites could be used more effectively, and;
- e) support opportunities to use the air space above existing residential and commercial premises for new homes.

Paragraph 124 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps to make development acceptable in communities.

Paragraph 127 states that planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term, but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, whilst not preventing or discouraging appropriate innovation or change;

- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building type and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks;
- f) create places that are safe, inclusive and accessible and which promote health and well-being.

Paragraph 174 states through protected enhanced biodiversity and geodiversity, plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and through protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Applicant's Response

In response to the newly published National Planning Policy Framework (2018), it should be noted that there are no substantial alterations which affect the proposed development. That being said, the above does bring the Planning Statement up to date and I have the following comments to make.

Paragraph 8 continues the emphasis on sustainable development which comprises a mix of economic, social and environmental objectives.

Under social this encourages healthy communities as well as a range of homes to meet present and future needs. The development includes a mixed development of both flats and houses at various different sizes together with a mix of market and affordable housing.

The development is carefully laid out to also provide additional social benefits including allotments and communal open space to encourage the interaction of residents. The environment objectives seeks for an enhancement to the natural environment and development is also considered how ecological biodiversity can be improved across the site and that has been included as part of the application.

Whilst paragraph 12 does state that where planning application conflicts with an up to date Development Plan, permission should not normally be granted. However, it should be noted the use of the word 'normally' and furthermore the paragraph does allow for exceptions whereby material considerations in a particular case indicate that the Plans should not be followed.

One of the original aspects of regional application was a lack of a 5 year housing land supply – this will be commented on further when I refer to the Arun Local Plan. That being said, the site is still rather unique in its nature. It forms a one hectare area of green space that is used infrequently for the grazing of animals purely for the management of the grass.

The site is dissected from the wider countryside by an industrial estate to the south, caravan park to the east and the settlement boundary and housing to the north. Furthermore, under the new Arun Local Plan (to be discussed) there is a substantial housing allocation to the east of the settlement which when developed, will further remove the site from being read as part of the countryside. The

result of which is an area of land which falls immediately adjacent to a settlement boundary but provides no purpose. It is surrounded on all sides by development, even housing on the western side of Lidsey Road.

Paragraph 77 encourages development to reflect local needs. It accepts that affordable housing outside development boundaries can be acceptable and consideration needs to be given to allowing some other market housing would help to facilitate the delivery of affordable housing. In this instance, the site is intending to deliver 30 dwellings, 10 of which would be affordable.

Paragraph 78 promotes sustainable development in rural areas by focusing housing which would enhance or maintain the vitality of rural communities. The site falls immediately adjacent to the settlement boundary and as a result, the proposed residents will make use of the existing facilities in Woodgate including the public house and shops. The development will therefore fully embrace paragraph 78.

Going further, paragraph 81 encourages Planning Policy to accommodate working practices not anticipated in the plan. The development includes a communal work hub intended to encourage occupiers from working at home as opposed to travelling to work. This innovative working and site arrangement should be encouraged.

On employment, paragraph 84 recognises that commercial development may have to be found adjacent to or beyond existing settlements and in locations that are not well served by public transport. However, if such development is to come forward this should be physically well related to existing settlements which the site is. Being immediately adjacent to the settlement boundary would fully comply with paragraph 84.

Turning to transport, paragraph 103 confirms that transport solutions will vary between rural and urban areas and should be taken into account in decision making. The site does fall adjacent to a bus stop and whilst this may not be a regular service found within a town or city, this should not be dismissed. Bus companies are encouraged to improve their offering if there is a demand for the service. Without the further growth in Woodgate, bus companies are not encouraged to improve their services.

Paragraph 118 states that planning decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes and should also promote and support the development of under-utilised land. As already mentioned, the development scheme comprises of a mix of market and affordable housing, social benefits such as allotments as well as commercial space. The site in question is underutilised and provides an excellent opportunity to provide mixed use development in a sustainable way and in a sustainable location.

Paragraphs 124 and 127 encourage good design and good architecture. The architect instructed on the project has certainly embraced this approach and designed something of very high quality.

The Arun Local Plan

The Arun Local Plan covers the period 2011-2031 for the area of Arun District (excluding the area covered by the South Downs National Park Authority) and was adopted on 18 July 2018.

Policy SDSP1 states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development, contained in the National Planning Policy Framework. It will work proactively with applicants to jointly find solutions, which means that proposals can be approved wherever possible and to secure development which will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements.

Policy SDSP1A states that to maintain the district's unique character as a coastal location set against the South Downs whilst ensuring the needs of community are met through sustainable growth and the provision of suitable services, the spatial strategy for Arun District to 2031 includes providing for growth of the sustainable villages whilst maintaining their setting within the open countryside.

Policy SDSP2 states that built up area boundaries are defined to the main towns and villages in the district. Development should be focused within the built up area boundaries and will be permitted, subject to consideration against other policies of this local plan.

Policy CSP1 states that outside the built up area boundaries, land will be defined as countryside and will be recognised for its intrinsic character and beauty. To ensure better management of the rural urban fringe in those areas where significant new development is proposed, early consideration will need to be given to landscape and biodiversity enhancement, woodland management, recreation provision and access routes.

Policy EMPSP1 states that the Council, with partners, will promote the sustainable growth of the district's economy to meet the varying needs of economic sectors and to support generation within the two main towns. This will comprise supporting sustainable employment opportunities in inland settlements and rural areas.

Policy EMPDM1 states that planning permission will be granted on sites outside the built up area, provided that the proposal demonstrates;

- a) that this is an appropriate sized extension of an existing employment site, or no acceptable alternative can be identified within existing permitted or allocated sites, or within or through redevelopment of existing commercial premises;
- b) it would not intensify uses at the site to the detriment of existing public access routes and highways,
- c) a high standard of design, layout and landscaping appropriate to the context;
- d) that it is capable of being well served by public transport or otherwise is readily accessible by means other than by private car to a significant residential workforce if employment intensive uses are proposed;
- e) access arrangements and parking facilities will be provided in accordance with the Council's adopted standards;
- f) a sympathetic relationship to the surrounding areas that shows consideration of the landscape, habitat, built and historic environment context, the opportunities to deliver onsite habitat and protect key species;

- g) a satisfactory relationship with neighbouring uses in order that the amenities of nearby residents, in particular, are protected, and;
- h) where appropriate, crime prevention measures are incorporated.

Policy HSP2C states that there is an allocation around Barnham/Eastergate/Westergate (SD5). This allocation is located around the small settlements of Barnham, Eastergate and Westergate. This strategic allocation will provide at least 2,300 dwellings over the planned period and up to 3,000 in total.

Policy HDM1 states that the Council will seek a mix of dwelling types and sizes, to including affordable housing units that adhere to the latest Homes & Communities Agency design guidance. For developments of 11 units or more, the Council shall require a balanced mix of market and affordable dwelling sizes, including family sized accommodation based on the most up to date SHMA recommendations.

Policy AHSP2 states that for all developments of 11 residential units or more, the Council will require a minimum 30% of the total number of units proposed on site to be provided as affordable housing on the same site in the first instance.

Policy HSP3 states that this policy would only apply when the housing need cannot be met on allocated housing sites or within the built up area boundary. Housing on rural exception sites will be permitted where they meet all of the following criteria and are consistent with all other local plan policies:

- a) the site is located within a parish with an identified level of housing need following the undertaking of a local housing needs survey and will contribute towards meeting that identified need;
- b) the exception site is adjacent to an existing built up area boundary, or is well related to existing residential development and the amenity is located in, or adjacent to, a clearly identifiable village or settlement, and;
- c) the proposed development would be appropriate to the settlement and area in which it is proposed to be located in terms of scale, form and character.

Policy HWBSP1 states that all development shall be designed to maximise the impact it can make to promoting healthy communities and reducing health inequalities. In particular, regard shall be had to:

- a) providing or contributing to the necessary infrastructure to encourage physical exercise and health, including accessible open space, sports and recreation facilities and safe, well-promoted walking and cycling routes;
- b) creating mixed use development and multi-use community buildings that reduce the need to travel by providing housing, services and employment in close proximity to each other, and;

- c) ensuring that art and cultural facilities are accessible to all residents and visitors to the district.

Policy OSRSP1 states that the Council will encourage the development of sites as allotments subject to all of the following criteria:

- a) the land shall be situated within or immediately adjacent to the built up area boundary or adjacent to community facilities or on appropriate sites close to residential areas;
- b) the land shall be suitable and be easily accessible;
- c) adequate water supply and parking facilities shall be provided on site;
- d) located so that natural surveillance can be maximised; and
- e) secure boundaries should surround the area of the allotment.

Applicant's Response

Following the submission of the planning application, the new Arun Local Plan was adopted. This forms a material consideration in the determination of the application.

Policy SDSP1 emphasises that there is a presumption in favour of sustainable development. The proposals have fully embraced this approach both in terms of the form of development and its design. As mentioned earlier, the NPPF 2018 sets out the definition of sustainable development at paragraph 8 and the proposed development would meet those requirements.

Policy SDSP1A states that the special strategy for Arun District to 2031 includes providing for the growth of the sustainable villages, whilst maintaining a setting within the open countryside. The location of the development is not within the open countryside as referred to but is instead, an area of green space enclosed within development. The site would therefore fall within the sustainable village of Woodgate whilst immediately adjacent to the settlement boundary.

Policy CSP1 states that outside the development boundaries, land will be defined as countryside and will be recognised for its intrinsic character and beauty. Whilst the site in question does fall outside of development boundary, it is not considered open countryside or to have intrinsic character or beauty. As already mentioned, the site is encompassed by development on both the north east and south together with residential development across the road to the west. As a result, the development is read more in context with existing development as opposed to the open countryside beyond. As I mention shortly, even the open countryside to the east, beyond the caravan park, is to be redeveloped for up to 3,000 homes.

Policy EMPSP1 seeks to prevent sustainable growth of the districts economy by seeking sustainable employment opportunities in rural areas. The development provides a mixed use scheme together with housing and employment spaces.

Policy EMPDM1 states that planning permission will be granted on sites outside the built up area provided that proposal demonstrates a high standard design, layout and landscaping appropriate to

the context. As the submitted plans demonstrate, the development is of high quality and its design and layout and landscaping are fully considered.

As mentioned in numerous occasions already, Policy HSP2C allocates 2,300 - 3,000 dwellings to the east of Eastergate and Westergate. This site falls immediately east of the application site behind the caravan park. This is a key consideration for the application as its substantially changes the character of the immediate area. Whilst the application site does fall outside of the settlement boundary of Woodgate, this allocation further emphasises that the site is not within open countryside. Instead, whilst the site was already isolated from the open countryside by the development surrounding it, to develop up to 3,000 homes further dissects the site from the open countryside. The result of which is an area of greenery that is read more in context with the built form than with the countryside.

Policies HDM1 and AHSP2 require a mix of dwelling types including market and affordable dwellings as well as a requirement for 30% of dwellings to be affordable. The proposal provides a mix of market and affordable and does provide the 30% under Policy AHSP2.

Policy HSP3 does state that housing outside of development boundaries can provide suitable locations for affordable housing. As already mentioned, the NPPF does accept that in some instances it is possible to allow market and affordable housing on a mixed site outside a settlement boundary.

Policy HWBSP1 states that we should private housing and employment in close proximity to each other. The development site comprises a mixture of housing, employment and social elements which fully embraces this policy.

Lastly, Policy OSRSP1 encourages the development of allotments. The development includes an area of allotments for the proposed residents in accordance with this policy.

Wings Nursery Planning Application

A Planning Application for 55 dwellings at Wings Nursery was refused planning permission on 8 August 2018.

This site differs from the application submitted at land at North Lees, Lee's Yard, Lidsey Road in several aspects.

The Planning Officer's report stated the following:

On 6 December 2017 Local Plan Sub-Committee resolved to invite planning applications on sites identified as deliverable in the HELAA in an attempt to boost the supply of housing in the short term. This was in response to a shortage of housing supply and the need to take steps to boost the supply, especially in view of the forthcoming local plan examination. The decision of LPSC on 30 October confirmed that this would be a consideration to applications submitted until the local plan is adopted. Therefore, applicants for current planning applications will have some comfort that the resolution of full council will continue to be under consideration after the status of the development plan changes and the maximum opportunity is taken to boost housing supply in the short term.

The site in question was considered to be developable in HELAA.

The principle of residential development on this site is contrary to the development plan. The proposed development would provide an additional 55 houses which are not required in the district at the present time due to the 5.3 year housing land supply identified in the inspector's comments on the local plan. Whilst the development would have a small positive effect on the supply of housing, the principle of residential development on this site would, in current policy circumstances as set out in the NPPF, not be acceptable.

The existing character of this section of Lidsey Road has a broadly linear development on the opposite side of the road, whilst the current site is generally open and features more sporadic development. The proposed density is relatively low and the site could be developed in a way which respects the character of the southern approach to Aldingbourne.

The application has been assessed by WSCC Highways. Despite initial objection, Highways do not have any objections to the use of the accesses and do not consider that the impact of the proposal on the operation of the highway network will be severe. The application is, therefore, considered to comply with Paragraph 32 of the NPPF.

Policy AH2 of the LLP 2011-2031 seeks 30% affordable housing. This is more up to date than the ANDP policy which seeks 40%.

The application site is outside the defined built up area boundaries of Aldingbourne and is, therefore, contrary to policy CSP1 of the Arun Local Plan 2011-2031 of the ADLP and policy EH1 and H6 of the ANDP which seek to protect the countryside. The Council can now demonstrate a 5 year supply of housing land through the recently adopted local plan 2011-2031 and NPPF paragraphs 11 and 12 support refusal of such applications where there is an up to date plan.

Applicant's Response

Since the submission of the planning application, an application was submitted at Wings Nursery for 55 dwellings. This was refused in early August. As this site falls to the north west of the application site, it is considered important to refer to. Essentially, the application was refused due to it being outside of a development boundary at a time when Arun District is able to meet its five year housing land supply. As already mentioned, the NPPF does allow for applications to be approved not in accordance with an adopted Development Plan if there are material considerations supporting the application.

In the instance of the Wings Nursery application, the site was on western side of Lidsey Road in open countryside. The development of 55 dwellings at a very high density would substantially change the approach to Woodgate including amending its character, appearance and setting. The site would be easily visible from the open countryside from the west and again will substantially amend and change the character of Woodgate.

In the case of the application site, the site is encompassed by developments on all sides and is read more in context with Woodgate as opposed to the open countryside. To the east and behind the site is an established caravan park and furthermore, behind this is an allocation for up to 3,000 new homes.

These material considerations, in our view, substantially override the need to refuse the application simply because it falls on the wrong side of a line.

Whilst the application at Wings Nursery was refused due to it being outside the settlement boundary, the NPPF does accept that this does not necessarily mean it should be refused but consideration needs to be given to other material considerations. In this instance I feel that the area overriding material considerations which would support the development in question.

Representations

The application has been in receipt of four local representations. These are summarised as follows:

- Woodgate Road – traffic generation and pressure on local services
- Lee's Yard – potential impact on employment activities
- D & R Structures Ltd – potential impact on employment activities
- Holdens Farm Caravan Park – need to maintain services and traffic
- Parish Council – conflict with Neighbourhood Plan by way of being outside of Development Boundary, design and potential impact on employment activities at Lee's Yard

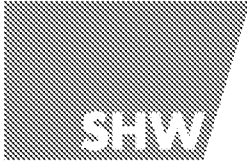
Applicant's Response

The application has been subject to five letters of objection. Two of these relate to Lee's Yard to the south of the site. Both of these representations raised concerns about the potential for residential development to the north to restrict their activities. The application has been submitted with and supported by a Noise Survey at the request of the Council. This demonstrates that mitigation measures can be introduced which would reduce any noise impact on the proposed development. It should also be noted that there has been a well-established tree belt along the southern boundary which already provides a substantial mitigation measure.

One neighbour has objected to the application based on traffic generation and pressure on local services. The application is supported by a Transport Statement and has attracted no objections from Highways. Additionally, whilst local services are under pressure, this is exactly why a development of this type should be approved. As with any planning application, Section 106 contributions can be sought which are then allocated to those services under pressure. Furthermore, development also results in the new homes bonus, increase in Council tax and business rates. All of these income generators allow for further improvement and expansion of local facilities for residents.

The neighbouring Caravan Park has raised an objection, essentially these concerns relate to the need to maintain services and a concern over congestion by any increase in traffic. As already mentioned, the application is supported by a Transport Statement and has attracted no objections from Highways.

The last objection is from the Parish Council. The applicant considers this a great shame. As referred to in the Planning Statement, the applicant at the earliest opportunity offered to meet the Parish Council, to understand what they would like to see on the site. The applicant's invitation was turned down and we have therefore had to move forward with a development that we felt would meet the aims and objectives for the Parish. The objection relates to the Neighbourhood Planning as the



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site is outside of development boundary, and there are concerns over design and potential impact on the employment activities at Lee's Yard.

Summary

As already mentioned, whilst the site does fall on the south side of the development boundary. This is along a northern boundary of the site. The NPPF and Planning Policy at all levels encourages sustainable development. Whilst the site may fall on the wrong side of a line, it does not suddenly mean that the development is unsustainable. Instead, the development presented meets a wide of range of needs for the community including market, affordable housing and employment opportunities as well as potential for social interaction by way of communal open spaces and allotments.

Design, of course, is debatable, but the architects on this project have designed something of high quality which maximises so it will gain. Additionally, as already mentioned, the development has taken in consideration Lee's Yard and its activities.

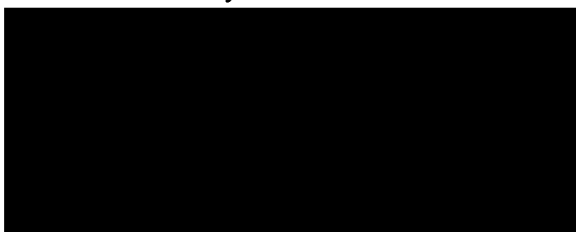
Whilst there have been some changes in circumstances since the submission of the planning application, it is not considered that they are significant to outweigh the benefits of the proposals.

The most substantial change is the publication of the new Arun Local Plan, which essentially confirms that the Local Planning Authority can provide a Five Year Housing Land Supply and the site falls outside of a development boundary. However, in turn the National Planning Policy Framework accepts that there are circumstances in which applications can be approved which are a departure from the Development Plan and equally the adopted Local Plan fundamentally changes the setting and positioning of the site in terms of any relationship with the countryside.

The scheme continues to provide a sustainable form of development, a mixed-use scheme designed to meet a wide range of housing and social needs with the introduction of allotments and a work hub in order to provide a truly mixed community.

It is therefore considered that the application should be supported.

Yours sincerely



Alex Bateman BA (Hons) MSc MRTPI
DIRECTOR OF PLANNING
for and on behalf of
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